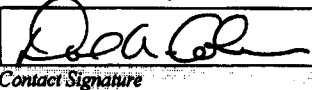


EXHIBIT 76

FINANCE & ACCOUNTING STANDARD OPERATING PROCEDURES MANUAL		
SOP Title: System to Disclose Suspicious Orders of Controlled Substances		
Approval:		Revision Date: 3/12/03
	<i>Contact Signature</i>	<i>Approver's Signature</i>
D. Colucci	E. Mahony	SOP Number: 7.7
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1. Objective:

- 1.1. To define the system for monitoring and disclosing suspicious orders of controlled substances.

2. Introduction:

- 2.1. Drug Enforcement Administration (DEA) regulations [21 CFR 1301.74] require all DEA registrants that distribute controlled substance products to maintain a system to disclose suspicious orders of controlled substances.
- 2.2. Specifically, DEA regulations require the following:
 - "The registrant shall design and operate a system to disclose to the registrant suspicious orders of controlled substances."
 - "The registrant shall inform the Field Division Office of the Administration of suspicious orders when discovered by the registrant. Suspicious orders include orders of unusual size, orders deviating substantially from a normal pattern, and orders of unusual frequency."

3. Frequency:

- 3.1. These procedures are to be followed for all sales of controlled substance products.

4. Procedure for Customer Service:

- 4.1. During the ordinary course of business, members of the controlled substance team in Customer Service are familiar with customer order frequencies, order quantities, and dollar amounts. They review each order for unusual quantities or any other deviation from the customer's regular order pattern.

- 4.2. If any deviations are found, the CSR will submit the customer's purchase order to the Senior Manager of Customer Service or the Senior Director of Finance Operations for further review, as outlined in section 6 below.

5. Procedure for Credit Analyst:

- 5.1. As part of the system SAP will automatically place an order on credit hold for further review if the customer's credit line is exceeded.
- 5.2. The Credit Analyst will check the order and, if it deviates from the customer's normal purchasing requirements, will refer the order to the Director of Credit Services for further review, as outlined in section 6 below.

6. Procedure for Senior Manager of Customer Service, Senior Director of Finance Operations, or Director of Credit Services:

- 6.1. One of the above personnel will review the situation and, if the order is suspicious as defined in section 2.2 above will contact the customer to obtain additional information.
- 6.2. In determining whether or not to release the order the following factors may be considered:
 - The explanation for the order received from the customer
 - The customer's existing credit line
 - Purdue's credit line insurance limits
 - The customer's payment history
 - Any recent business developments that may have arisen since the customer's last credit review.
- 6.3. After all information has been gathered the Director of Credit will contact the Executive Director of National Accounts & Trade Relations and the Director of Supply Chain Security providing all of the details and requesting their input and additional investigation if deemed necessary.

7. Communication of Suspicious Orders:

- 7.1. The Director of Credit will provide the Associate General Counsel with all of the information gathered from Credit Services, Customer Service, National Sales and Purdue's Security Group and make an order recommendation. The Law Department will determine if further investigative steps are required and if the findings should be reported to the Field Office of the DEA.

- 7.2. On receipt of input from the Associate General Counsel, the Director of Credit will make a final report and recommendation to the following senior executives and include a copy of the recommendation in the customer's credit file.
 - Executive Vice President and Chief Financial Officer
 - Executive Vice President and General Counsel
 - Vice President Corporate Security
 - Vice President Field Operations and Marketing

- 7.3. In the event the order needs to be reported to the DEA field office Purdue's President and Chief Executive Officer will be notified.